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20 *Attorneys for Plaintiffs*

21 **UNITED STATES DISTRICT COURT**  
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 ARMANDO VILLANUEVA and  
24 HORTENCIA SAINZ, individually and  
25 as successor in interest to Pedro  
26 Villanueva, deceased, and FRANCISCO  
27 OROZCO, individually,

28 Plaintiffs,  
vs.

STATE OF CALIFORNIA; JOHN  
CLEVELAND; RICH HENDERSON,

Defendants.

Case No. 8:17-cv-01302-JLS-KESx

[Hon. Josephine L. Staton]

**NOTICE OF CONDITIONAL  
SETTLEMENT AND REQUEST TO  
VACATE ALL DATES**

*[Proposed Order filed concurrently  
herewith]*

COME NOW Plaintiffs FRANCISCO OROZCO, HORTENCIA SAINZ, ARMANDO VILLANUEVA and Defendants STATE OF CALIFORNIA; JOHN CLEVELAND; RICH HENDERSON, by and through their counsel of record ("the Parties") and hereby notify this Honorable Court as follows:

5 1. The Parties have participated in a mediation with Honorable Joseph  
6 Hilberman and have reached a conditional settlement of this entire case for  
7 a specified amount.

8 2. The settlement will be recommended to and must be approved by the  
9 appropriate authorities.

10 3. The parties jointly stipulate and request that the Court vacate all pending  
11 dates, including all pretrial filing deadlines and the trial date.

12 4. The parties further request that this Court retain jurisdiction over this  
13 matter to enforce the terms of the settlement.

15 | DATED: September 1, 2021 LAW OFFICES OF DALE K. GALIPO

Bv: /s/ Dale K. Galipo  
Dale K. Galipo  
Renee V. Masongsong  
Attorneys for Plaintiff *Francisco Orozco*

19 DATED: September 1, 2021

KIESEL LAW LLP

Bv: /s/ D. Bryan Garcia  
Paul Kiesel  
D. Bryan Garcia  
Ashley Conlogue  
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*Armando Villanueva and Hortencia*

1 DATED: September 1, 2021

ROB BONTA  
Attorney General of California

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Bv: /s/ *Donna M. Dean*

DONNA M. DEAN  
Deputy Attorney General  
Attorneys for Defendants  
State of California, Jon Cleveland,  
and Richard Henderson